

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

ORIGINAL

RECEIVED

JAN 26 1998  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

\_\_\_\_\_  
Federal-State Joint Board on )  
Universal Service )  
\_\_\_\_\_ )

CC Docket No. 96-45  
(Report to Congress)

AT&T COMMENTS ON REPORT TO CONGRESS

Mark C. Rosenblum  
Peter H. Jacoby  
Judy Sello

Room 3245I1  
295 North Maple Avenue  
Basking Ridge, NJ 07920  
(908) 221-8984

January 26, 1998

No. of Copies rec'd  
List ABCDE

024

## TABLE OF CONTENTS

	<u>Page</u>
SUMMARY .....	i
I. The Success Of Universal Service Requires Competitive Neutrality And A Broad Contribution Base .....	2
II. Internet Access And Internal Connections Should Not Be Funded By The USF And The Commission Must Ensure That ESPs Contribute To Universal Service On Their Telecommunications Revenues.....	9
III. The Commission Must Establish A Firm Compliance Program.....	13
CONCLUSION .....	15

### **SUMMARY**

In these comments, AT&T addresses those key areas which warrant further consideration to improve and sustain the universal service support mechanisms established under Section 254 of the Telecommunications Act, consistent with the Act's objectives and the Commission's intent to conduct a thorough reevaluation of who is required to contribute to universal service.

As AT&T shows in Part I, in accordance with Section 254's directives, the Commission has sought to establish a competitively neutral system of explicit subsidies funded by all carriers and available to all eligible new entrants. Although the Commission requires that USF support be assessed in a competitively neutral manner, *i.e.*, based on an interstate carrier's retail end user telecommunications revenues, the recovery of this assessment is not competitively neutral, because interexchange carriers will wind up funding the overwhelming portion of the ILEC assessment through their purchase of wholesale access services. Accordingly, the Commission should change the mechanism for universal service support recovery to a competitively neutral mandatory end user surcharge on all (interstate) retail telecommunications service revenues that is both assessed and recovered directly as a line item on the end user bill.

As also shown in Part I, the modifications the Commission recently made to the USF in its Fourth Reconsideration Order have inappropriately constricted the

contribution base and, in the long term, will jeopardize the viability of the program. Accordingly, AT&T urges the Commission to reexamine those exemptions, which clearly create enormous potential for abuse.

In Part II, AT&T demonstrates that Internet access and internal connections should not be funded by the USF because, although the Commission has interpreted the statutory definitions correctly, Section 254 does not provide authority to fund non-telecommunications services. In all events, the Commission should reassess whether this component of the program at an annual cost of \$2.25 billion, has been set at an unsustainable level.

At a minimum (and regardless of whether Internet access is supported by the USF), competitive neutrality and the broad contribution base necessary to support universal service require that, to the extent that a provider offers both telecommunications and information services, the telecommunications portion must be assessed USF support obligations. AT&T is concerned that although the Commission's universal service orders require this, statements by federal regulators appear to indicate that Internet-based providers of telecommunications services have not made and will not be making such contributions in the near future. Any Commission failure to enforce USF funding obligations (and access charge assessments) on telecommunications services that are provided over new technology backbones skews the market by making

providers of comparable services subject to vastly different payment obligations.

In Part III, AT&T shows that to ensure that Section 254's programs receive the required support in an equitable manner, a clearcut compliance plan is not only necessary, but essential. The Commission should therefore institute a compliance plan to ensure that entities that were required to file USF Worksheets have done so and have not under-reported their telecommunications revenues, with the result that the contribution amounts for entities that duly reported their revenues are higher than they should be.

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	(Report to Congress)

**AT&T COMMENTS ON REPORT TO CONGRESS**

Pursuant to the Commission's Public Notice, DA 98-2, released January 5, 1998, and its Order, DA 98-3, released January 14, 1998, AT&T Corp. ("AT&T") submits the following comments on the extent to which the Commission's interpretations of the Communications Act of 1934, 47 U.S.C. 151 et seq., as amended by the Telecommunications Act of 1996, relating to universal service are consistent with statutory requirements.

AT&T believes that, in general, the Commission in its proceedings under Section 254 of the Act has undertaken important steps to implement predictable and sufficient mechanisms to advance and preserve universal service, in high cost areas and for low-income consumers, as well as to establish the new support programs created by the 1996 Act for schools, libraries and rural health care. In its comments, AT&T will address those key areas which it believes warrant further consideration to improve and sustain that system of support, consistent with the statutory objectives. AT&T's comments are pertinent to the Commission's intent to "conduct a

thorough reevaluation of who is required to contribute to universal service, pursuant to Congress's direction to issue a report on this issue by April 10, 1998."<sup>1</sup>

**I.    The Success Of Universal Service Requires  
Competitive Neutrality And A Broad Contribution Base**

In Section 254 of the Telecommunications Act of 1996, Congress recognized that the current system of funding universal service, under which the long distance industry and its customers bear the entire burden of funding universal service, *i.e.*, making local telephone rates affordable for subscribers in high cost areas and for low-income consumers, through vastly inflated access charges was not an option because it is fundamentally incompatible with the Act's goal of opening local markets to competition. Consistent with the directives of Section 254, the Commission has sought to establish a competitively neutral system of explicit subsidies funded by all carriers and available to all eligible new entrants.

---

<sup>1</sup> Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Fourth Order on Reconsideration, FCC 97-420, released December 30, 1997, para. 255 ("Fourth Reconsideration Order"). Because the answers to several questions overlap substantially, AT&T's comments are not organized in a question and answer format.

Accordingly, in the May 8, 1997 Universal Service Order<sup>2</sup> (paras. 777-791), the Commission determined -- correctly in AT&T's view -- that, under Section 254(d) of the Telecommunications Act of 1996, all interstate telecommunications service providers offering service for a fee directly to the public on a common carrier basis are mandatory contributors to the federal USF. The Commission also determined that private service providers that offer interstate telecommunications services to others for a fee on a noncommon carrier basis must contribute under Section 254(d)'s permissive authority (paras. 793-796).

While AT&T wholeheartedly agrees with these rulings, in several important respects, AT&T believes that the Commission's scheme falls short of achieving competitive neutrality. First, Section 254(b)(4) of the Act requires that all telecommunications service providers make an equitable and nondiscriminatory

---

<sup>2</sup> Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 97-157, released May 8, 1997, pets. for review pending sub nom. Texas Office of Public Utility Counsel v. FCC, Nos. 97-60421 et al. (5<sup>th</sup> Cir.) ("Universal Service Order"), *id.*, Order on Reconsideration, FCC 97-246, released July 10, 1997; Second Order on Reconsideration, FCC 97-253, released July 18, 1997; Third Order on Reconsideration, FCC 97-411, released December 16, 1997; Fourth Order on Reconsideration, FCC 97-420, released December 30, 1997. Unless another Order is specifically referenced, all paragraph citations herein are to the Universal Service Order.



contribution to universal service support. Although the Commission requires that USF support be *assessed* in a competitively neutral manner, *i.e.*, based on an interstate carrier's retail end user telecommunications service revenues, the recovery of this assessment is not competitively neutral.<sup>3</sup> For example, of the \$1.79 billion in USF funding requirements the Commission anticipates will be required in the first half of 1998, \$439 million will be assessed on incumbent local exchange carriers ("ILECs") based on their relative retail end user revenues, but 92% of the ILEC assessment, or \$404 million, is allowed to be recovered through access charges under the Commission's price cap regime. This scheme is not competitively neutral because it converts the ILECs' retail assessment to recovery via wholesale services.

Accordingly, as AT&T urged in its July 11, 1997 petition for reconsideration (at 2-7) in this docket, the Commission should adopt an explicit, mandatory end user surcharge on all (interstate) retail telecommunications service revenues that is both assessed and recovered directly as a line item on the end user bill to establish a competitively neutral USF recovery mechanism. This would ensure that each consumer pays his or her fair share of universal service support. By contrast,

---

<sup>3</sup> Universal Service Order, paras. 829-30, 833 and 844.

allowing ILECs to continue to recover their USF assessments through access charges perpetuates the very system of implicit subsidies that the Act is intended to eliminate. Moreover, and as Commissioner Furchtgott-Roth explained in support of a line-item surcharge, "[i]n a competitive market, the government should never restrict the access to, or discourage the free flow of, information to consumers."<sup>4</sup> For one, "there is no statutory authority for the Commission to restrict or limit the content of billing information between a carrier and its customers. Indeed, Section 254(e) requires that funding mechanisms for universal service must be explicit."<sup>5</sup>

Apart from the Internet-based provider issues which potentially threaten to undermine the USF program and which are discussed separately in Section II, AT&T is concerned that the modifications that the Commission recently made to the USF in its Fourth Reconsideration Order have inappropriately constricted the USF contribution base and, in the long term, will jeopardize the viability of the program. Accordingly, AT&T urges the Commission to reexamine those exemptions, some of which clearly create enormous potential for abuse.

---

<sup>4</sup> Third Reconsideration Order, Dissenting Statement of Commissioner Harold Furchtgott-Roth at 2.

<sup>5</sup> *Id.* at 3.

For example, the exemption for system integrators' resale telecommunications revenues, so long as they do not comprise more than 5 percent of the firm's total system integration revenues,<sup>6</sup> could exempt substantial amounts of retail telecommunications revenues from USF contributions (5% of a \$200 million revenue stream being \$10 million). Moreover, this exemption will open up possibilities for gaming the process if telecommunications providers drive their major customers into numerous system integration subsidiaries. Similarly, as AT&T further showed, noncommon carrier transponders (including so-called "bare" transponders), which the Commission also exempted, constitute telecommunications services that should be assessed USF support obligations.<sup>7</sup>

The exemption from USF contributions accorded to nonprofit schools, colleges, libraries and health care providers<sup>8</sup> is likewise ill-conceived particularly given that, contrary to the Commission's rationale, institutions of higher education are not entitled to universal service support and it is these entities, not libraries and K-12 institutions, that are likely to be

---

<sup>6</sup> Fourth Reconsideration Order, para. 280.

<sup>7</sup> AT&T Opposition to Petitions for Reconsideration, CC Docket 96-45, filed August 18, 1997, p. 23.

<sup>8</sup> Fourth Reconsideration Order, para. 284.

resellers of telecommunications services to their students. In all events, the fact that an entity is a recipient of USF funds cannot logically be deemed sufficient to exempt it from USF *contribution obligations*.<sup>9</sup>

Moreover, it is clear that system integrators, transponder providers, educational institutions and health care providers all potentially compete with carriers to the extent that they sell telecommunications services.<sup>10</sup> For example, if an interexchange carrier provided services directly to the students or hospital patients, it would be required to count those revenues toward its universal service contribution base. This is even more apparent with system integrators and transponder providers serving large business customers. Therefore, competitive neutrality requires that these types of entities be required to contribute on the basis of the retail telecommunications service revenues that

---

<sup>9</sup> According to this erroneous rationale, a LEC could not be required to contribute to universal service support if it received high cost or low-income support.

<sup>10</sup> Indeed, this was one of the key reasons that Congress expressly prohibited institutions entitled to USF support from reselling the supported services. See 47 U.S.C. 254(h)(3) ("Telecommunications services and network capacity provided to a public institutional telecommunications user under this subsection may not be sold, resold, or otherwise transferred by such user in consideration for money or any other thing of value.")

they derive from resale and facilities-based provision of telecommunications service.<sup>11</sup>

AT&T also believes that the Commission should not have increased the *de minimis* exception from USF contributions from \$100 to \$10,000.<sup>12</sup> The ultimate responsibility for universal service resides with the end-user subscriber and, consistent with this premise, no carrier -- regardless of its size -- should be exempt. This loophole exempts the customers of small carriers from their obligation, thus creating a potential unfair marketing advantage to small, new entrants.

Most fundamentally, if the Commission exempts a class of contributors, then the obligations of all remaining contributors increases, contrary to the public interest and competitive neutrality. For these reasons, AT&T strongly objects to any and all claims for exemption from USF payment and reporting obligations.

---

<sup>11</sup> Other contributors are clearly harmed if these entities fail to report their resale telecommunications revenues but pay a USF obligation to AT&T when they are billed for their long distance services. In this instance the total industry contribution base is understated by the margins added by the reseller when it bills its customers. If the total industry amount is understated, AT&T and other contributors pay a higher amount. If *facilities-based* transponder providers do not report their retail telecommunications revenues, then that revenue is entirely exempted from USF assessment, thus driving up the contribution obligations of others.

<sup>12</sup> Fourth Reconsideration Order, para. 297.

**II. Internet Access And Internal Connections Should Not Be Funded By The USF And The Commission Must Ensure That ESPs Contribute To Universal Service On Their Telecommunications Revenues**

The definitions of "information service," "telecommunications," "telecommunications service," and "telecommunications carrier," as established in the 1996 Telecommunications Act are reasonable and consistent with historical meanings ascribed to those terms. For this reason, and as AT&T showed in its December 19, 1996 Comments (at 18-21) on the Joint Board's recommendations, the Commission plainly lacks statutory authority to include Internet access and internal connections (e.g., inside wire) support for schools and libraries in the USF because Sections 254(c)(1), (c)(3), (h) all refer to "telecommunications services" or the need to "enhance . . . access to" advanced services. But even if such authority exists, the Commission should certainly rethink whether the size of this component of the USF, at an annual cost of \$2.25 billion, has been set at an unsustainable level.

In all events, if the Commission continues to interpret its authority so broadly as to justify its holding that Internet access is to be funded by the USF, it must also interpret its authority to allow it to require Internet access providers also to contribute to the USF. This is crucial to ensure competitive neutrality and to reduce the hardship imposed

on telecommunications service providers in requiring them to underwrite this support.<sup>13</sup>

At a minimum (and regardless of whether Internet access is supported by the USF), competitive neutrality and the broad contribution base necessary to support universal service require that, to the extent that a provider offers both telecommunications and information services, the telecommunications portion must be assessed USF support obligations. The Commission has in the past appropriately distinguished between the "information service" and the "telecommunications service" offerings of a provider.<sup>14</sup> It has correctly

---

<sup>13</sup> The Commission's continuing exemption of enhanced service providers ("ESPs") from assessment of interstate access charges also violates competitive neutrality. The failure of ESPs to pay for their use of interstate access services imposes an exorbitant and unfair burden on interexchange carriers who must carry the full weight of access recovery. See AT&T Comments, filed March 24, 1997, in Use of the Public Switched Network by Information Services and Internet Access Providers, Notice of Inquiry, CC Docket No. 96-263, released December 24, 1996 ("NOI"), at 2-7, 23-25. In the Universal Service Order (para. 790), the Commission indicated that it would address comprehensively the obligations of providers of Internet-based service in the NOI. AT&T urges it to do so now.

<sup>14</sup> See, e.g., Northwestern Bell Telephone Company Petition for Declaratory Ruling, Memorandum Opinion and Order, 2 FCC Rcd 5986 (1987); and WATS Related and Other Amendments of Part 69 of the Commission's Rules, Memorandum Opinion and Order, 3 FCC Rcd 496, 497 (1988) ("[A]ny entity that actually provides enhanced services is treated as an 'enhanced service provider' for access charge purposes with respect to enhanced services, regardless of any other services that entity

maintained this distinction in the Universal Service Order by requiring all providers, including ISPs and ESPs, to contribute to the USF to the extent that they provide telecommunications service and exempted only their information service offerings from USF contribution obligations.<sup>15</sup> Notwithstanding express language in its orders, statements by federal regulators appear to indicate Internet-based providers of telecommunications services have not made and will not be making such contributions in the near future.<sup>16</sup>

---

(footnote continued from previous page)

might provide.") See also Universal Service Order, paras. 788-789.

<sup>15</sup> Universal Service Order, paras. 788 ("Information service providers (ISP) and enhanced service providers are not required to contribute to support mechanisms to the extent they provide such services.") (*emphasis supplied*); see also Fourth Reconsideration Order, para. 282 ("[A] private service provider that provides information services along with a basic interstate voice-grade telecommunications service is not relieved of its statutory obligation to contribute to universal service. To the extent that a provider is offering basic voice-grade interstate telephone service and is not otherwise exempt, it is required to contribute to universal service.")

<sup>16</sup> See, e.g., Remarks of FCC Commissioner Susan Ness before the Wall Street Journal Technology Summit, New York, NY, October 15, 1997 ("[S]ome have argued that, because Internet telephony may divert significant revenues away from traditional telecommunications carriers, we should require all Internet services to contribute to universal service funding lest universal service be imperiled. [] I believe that unfettered growth of the Internet and digital delivery mechanisms will result in more rapid delivery of better services, lower cost, and more choices than ever been seen before. Competition by service providers will put

(footnote continued on following page)



Any Commission failure to enforce USF funding obligations (and access charge assessments) on telecommunications services that are provided over new technology backbones skews the market by making providers of comparable services subject to vastly different payment obligations. Nowhere is this inequity more blatant than in the case of phone-to-phone telecommunications services that use Internet Protocol ("IP") technology in their long-haul networks (such as, for example, the telecommunications services offered by IDT and the announced phone-to-phone offerings of Qwest and FNet).<sup>17</sup> Moreover, any failure to enforce USF and access charge payment obligations flies in the face of the Commission's commitment to technology-neutral

---

(footnote continued from previous page)

downward pressure on prices -- even to rural America. Competition -- not regulatory action -- is the preferred course of action.")

Similar sentiments were voiced recently by FCC Chairman Kennard. See, e.g., "New FCC Chief Confronts Telecom Tangle," Newark Star Ledger, January 18, 1998, Sect. 3, p. 1, 3 ("My gut feeling is the Internet should be as unfettered as possible. [] We know the Internet . . . is a wonderfully useful tool in society, and it would be tragic if those of us in government rushed to regulate it in a fashion that might inhibit its growth.")

<sup>17</sup> See IDT Press Release, "IDT's Net2Phone Launched Phone-To-Phone Technology Via The Internet," [www.net2phone.com](http://www.net2phone.com); "Qwest Announces First Nationwide IP Voice Service," Business Wire, December 15, 1997; "FNet Announces Premier InterNet Telephone Network," October 27, 1997, [www.ftel.com](http://www.ftel.com).

policies,<sup>18</sup> and triggers more artificially-stimulated migration from traditional circuit switched telephony to packet switched IP services that are able to take advantage of this "loophole."

Indeed, even in those instances where it is difficult to distinguish between telecommunications and information services provided on a "hybrid" basis, the Commission could avoid inequities by applying pragmatic solutions to "mixed use" services such as it has applied in other contexts (for example, the surcharge for leaky PBXs and private line usage factors) to develop surrogates for the telecommunications service portion of the providers' revenues for USF assessment. Ultimately, the failure to do so could undermine universal service, as Internet providers combine their offerings to avoid their support obligations.

### **III. The Commission Must Establish A Firm Compliance Program**

To ensure that Section 254's programs receive the required support in an equitable manner, a clearcut compliance plan is not only necessary, but essential. AT&T has urged the Commission to institute a compliance plan to ensure that entities that were required to file USF Worksheets (FCC Form 457) have done so and have not

---

<sup>18</sup> Cf. Universal Service Order, para. 780 ("We agree with the Joint Board that 'packet switched' services can qualify as interstate telecommunications").

under-reported their telecommunications revenues, with the result that the contribution amounts for entities that duly reported their revenues are higher than they should be.

AT&T made a compliance plan proposal in its November 19, 1997 letter addressed to the Proposed First Quarter Universal Service Contribution Factors. AT&T's proposal included the need for an audit, accounting order, public disclosure of the list of filing entities along with the total retail revenues for each reporting entity used as the contribution base, as well as creation and disclosure of a composite USF Worksheet by industry segment to help monitor and ensure conformance with the Commission's programs.<sup>19</sup> AT&T urges the Commission to move forward with this compliance proposal, as it prepares its report to Congress.

---

<sup>19</sup> In addition, the Commission should take active steps to get the websites of the Schools and Libraries Corporation and the Rural Health Care Corporation up and running. The fact that these websites are not yet available has created significant confusion for USF recipients and carriers. Once the websites are functional, carriers must be able to determine that a particular applicant's request for a discount has been approved and the level of the discount. To ensure the integrity of the process and in fairness to other recipients, at least random audits of the recipients should be required. The Commission should clarify that once a subsidy is approved, it will be provided to the carrier that provides services in good faith in reliance on that approval, even if the recipient is later found not to be in compliance.

- 15 -

CONCLUSION

For the reasons stated above, the Commission should reexamine the foregoing issues as it reviews its compliance with the 1996 Act's directives as to universal service issues.

Respectfully submitted,

AT&T CORP.

By



Mark A. Rosenblum  
Peter H. Jacoby  
Judy Sello

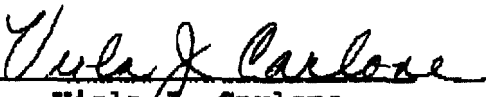
Room 3245I1  
295 North Maple Avenue  
Basking Ridge, New Jersey 07920  
(908) 221-8984

Its Attorneys

January 26, 1998

**CERTIFICATE OF SERVICE**

I, Viola J. Carlone, do hereby certify that on this 26<sup>th</sup> day of January, 1998, a copy of the foregoing AT&T Comments on Report to Congress was served by U.S. first class mail, postage prepaid, to the parties listed on the attached Service List.

  
Viola J. Carlone

## SERVICE LIST

The Honorable William E. Kennard, Chairman  
Federal Communications Commission  
1919 M St., NW, Room 814  
Washington, DC 20554

The Honorable Michael K. Powell, Commissioner  
Federal Communications Commission  
1919 M St., NW, Room 844  
Washington, DC 20554

The Honorable Susan Ness, Commissioner  
Federal Communications Commission  
1919 M St., NW, Room 832  
Washington, DC 20554

The Honorable Harold W. Furchtgott-Ross,  
Commissioner  
Federal Communications Commission  
1919 M Street, NW, Room 802  
Washington, DC 20554

The Honorable Gloria Tristani, Commissioner  
Federal Communications Commission  
1919 M Street, NW, Room 826  
Washington, DC 20554

The Honorable Julia Johnson, Commissioner  
Florida Public Service Commission  
Gerald Gunter Bldg.  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

The Honorable David N. Baker, Commissioner  
Georgia Public Service Commission  
244 Washington Street, SW  
Atlanta, GA 30334-5701

The Honorable H. Russell Frisby,  
Commissioner  
Maryland Public Service Commission  
16<sup>th</sup> Floor, 6 Paul Street  
Baltimore, MD 21202-6806

The Honorable Laska Schoenfelder, Commissioner  
South Dakota Public Utilities Commission  
State Capitol, 500 E. Capitol St.  
Pierre, SD 57501-5070

Martha S. Hogerty  
Office of Public Counsel  
301 West High Street, Suite 250  
P.O. Box 7800  
Jefferson City, MO 65102

Thomas Power  
Federal Communications Commission  
Office of Chairman  
1919 M St., NW, Room 814  
Washington, DC 20554

Charles Bolle  
South Dakota Public Utilities Commission  
State Capitol, 500 E. Capitol St.  
Pierre, SD 57501-5070

Deonne Bruning  
Nebraska Public Utilities Commission  
300 The Atrium, 1200 N St.  
P.O. Box 94927  
Lincoln, NE 68509-4927

James Casserly  
Federal Communications Commission  
Office of Commissioner Ness  
1919 M St., NW, Room 832  
Washington, DC 20554

Rowland L. Curry  
Texas Public Utility Commission  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, TX 78701

Ann Dean  
Maryland Public Service Commission  
16<sup>th</sup> Floor, 6 Paul Street  
Baltimore, MD 21202-6806

Bridget Duff, State Staff Chair  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0866

Legal Advisor  
Federal Communications Commission  
Office of Commissioner Chong  
1919 M St., NW, Room 844  
Washington, DC 20554

Emily Hoffnar, Federal Staff Chair  
Federal Communications Commission  
Accounting and Audits Division  
Universal Service Branch  
2100 M St., NW, Room 8617  
Washington, DC 20554

Lori Kenyon  
Alaska Public Utilities Commission  
1016 W. Sixth Ave., Suite 400  
Anchorage, AK 99501

Mark Long  
Florida Public Utility Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32299-0866

Sandra Makeeff  
Iowa Utilities Board  
Lucas State Office Bldg.  
Des Moines, IA 50319

Philip F. McClelland  
Pennsylvania Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

Thor Nelson  
Colorado Office of Consumer Counsel  
1580 Logan Street, Suite 610  
Denver, CO 80203

Barry Payne  
Indiana Office of the Consumer Counsel  
100 N. Senate Ave., Room N501  
Indianapolis, IN 46204-2208

Timothy Peterson, Deputy Division Chief  
Federal Communications Commission  
Accounting and Audits Division  
2000 L Street, NW, Room 812  
Washington, DC 20554

James Bradford Ramsay  
National Assn. of Regulatory Utility  
Commissioners  
1100 Pennsylvania Ave., NW  
P.O. Box 684  
Washington, DC 20044-0684

Brian Roberts  
California Public Utilities Commission  
505 Van Ness Ave.  
San Francisco, CA 94102

Kevin Schwenzfeier  
NYS Dept of Public Service  
3 Empire State Plaza  
Albany, NY 12223

Tiane Sommer  
Georgia Public Service Commission  
244 Washington Street, SW  
Atlanta, GA 30334-5701

Sheryl Todd (plus 8 copies)  
Federal Communications Commission  
Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8611  
Washington, DC 20554

Lisa Boehley  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8924  
Washington, DC 20554

Bryan Clopton  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8615  
Washington, DC 20554

Irene Flannery  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8922  
Washington, DC 20554

Pamela Gallant  
Federal Communications Commission  
CCB, Accounting and Audits Division  
2100 M Street, NW, Room 8912  
Washington, DC 20554

Lisa Gelb  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8601  
Washington, DC 20554

L. Charles Keller  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8918  
Washington, DC 20554

Diane Law  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8920  
Washington, DC 20554

Cheryl Leanza  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8905  
Washington, DC 20554

Robert Loebe  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8914  
Washington, DC 20554

Maryanne McCormick  
Federal Communications Commission  
CCB, Accounting and Audits Division  
2100 M Street, NW, Room 8619  
Washington, DC 20554

Mark Nadel  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8916  
Washington, DC 20554

Kimberly Parker  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8609  
Washington, DC 20554

Richard D. Smith  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8605  
Washington, DC 20554

Natalie Wales  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8405  
Washington, DC 20554

Lori Wright  
Federal Communications Commission  
CCB, Accounting and Audits Division  
Universal Service Branch  
2100 M Street, NW, Room 8603  
Washington, DC 20554